

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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JAMARR KELLAM,	:
	:
Plaintiff,	: CIVIL ACTION NO.
	: 2:10-cv-01644-JCJ
v.	:
	:
INDEPENDENCE CHARTER SCHOOL,	:
	:
	:
Defendant.	:
	:

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**MOTION FOR SUMMARY JUDGMENT OF  
DEFENDANT INDEPENDENCE CHARTER SCHOOL**

Defendant, Independence Charter School, by and through its undersigned counsel, Segal McCambridge Singer & Mahoney, Ltd., respectfully moves for Summary Judgment on all issues and causes of action for the reasons set forth in the attached Brief.

Respectfully submitted,

**Segal McCambridge Singer & Mahoney, Ltd.**

Dated: March 23, 2011

By: /s Brian W. Franklin  
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**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), the undersigned certifies that a true and correct copy of the Motion for Summary Judgment of Defendant Independence Charter School, Brief in Support thereof, and Separate Statement of Undisputed Material Facts, was electronically filed with the Clerk of the Court using the CM/ECF system which automatically sent notification of such filing to the below listed individual(s). The document so filed is available for viewing and downloading on the ECF System.

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**Attorney for Plaintiff**

**Segal McCambridge Singer & Mahoney, Ltd.**

By: /s Brian W. Franklin  
Brian W. Franklin, Esquire

Date: March 23, 2011